Case 2:15-cv-01200-APG-NJK Document 31 Filed 12/14/15 Page 1 of 2 1 Lynn V. Rivera, Esq., Nevada Bar No. 6797 **BURNHAM BROWN** 2 A Professional Law Corporation 200 S. Virginia Street, 8th Floor 3 Reno, NV 89501 Telephone: 775-398-3065 4 Fascimile: 877-648-5288 Email: lrivera@burnhambrown.com 5 Attorneys for Defendant 6 NORDŠTROM fsb (erroneously sued as NORDSTROM, INC.) Michael Kind, Esq., Nevada Bar No. 13903 8 KAZEROUNI LAW GROUP, APC 7854 W. Sahara Group 9 Las Vegas, NV 89117 Facsimile: (800) 520-5523 10 Telephone: (800) 400-6808 x7 mkind@kazlg.com 11 David H. Krieger, Esq., Nevada Bar No. 9086 12 HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 350 13 Henderson, Nevada 89123 Phone: (702) 880-5554 14 Fascimile: (702) 385-5518 dkrieger@hainesandkrieger.com 15 Attorneys for Plaintiff 16 JOVITÁ C. SALVADOR 17 UNITED STATES DISTRICT COURT 18 19 **DISTRICT OF NEVADA** JOVITA C. SALVADOR, No. 2:15-CV-01200-APG-NJK 20 STIPULATION TO EXTEND TIME 21 Plaintiff, FOR DEFENDANT NORDSTROM fsb 22 TO RESPOND TO PLAINTIFF'S **COMPLAINT** CAPITAL ONE, INC., CAPITAL ONE 23 (SECOND REQUEST) FINANCE, INC. NORDSTROM, INC., 24 WELLS FARGO HOME MORTGAGE, and Complaint Filed: June 24, 2015 Trial Date: None

EQUIFAX CREDIT INFORMATION SERVICES. Defendants.

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Initial Response Date: November 13, 2015

First Request Response

Date: December 13, 2015 New Response Date: January 12, 2016

Plaintiff JOVITA C. SALVADOR ("Plaintiff") and Defendant NORDSTROM fsb

1	(erroneously sued as NORDSTROM, INC.) ("Defendant"), by and through their respective		
2	counsel of record, submit this Stipulation, Second Request, pursuant to U.S. District Court,		
3	Nevada Civil Local Rule 6-1(a) to extend Defendant's time to file a responsive pleading to		
4	Plaintiff's Complaint as follows:		
5	1. Plaintiff's Complaint w	Plaintiff's Complaint was filed on June 24, 2015.	
6	2. Defendant was served o	Defendant was served on October 23, 2015 with Defendant's responsive	
7	pleading due on November 13, 2015.	ng due on November 13, 2015.	
8	3. Plaintiff and Defendant	Plaintiff and Defendant met, conferred and agreed to extend Defendant's time to	
9	file a responsive pleading to Plaintiff's Complaint to December 13, 2015 (First Request).		
10	4. Plaintiff and Defendant	Plaintiff and Defendant met and conferred, and have now agreed to extend	
11	Defendant's time to file a responsive p	Defendant's time to file a responsive pleading to Plaintiff's Complaint to January 12, 2016.	
12	5. This Stipulation is made	This Stipulation is made in good faith and based on the parties' hope that the	
13	additional extension of time will allow the parties to continue to negotiate, and potentially		
14	reach an early resolution of this matter	each an early resolution of this matter.	
15	6. The new deadline does	not alter the date of any hearing.	
16	IT IS SO STIPULATED AND AGREED:		
17	DATED: December 13, 2015	BURNHAM BROWN	
18		<u>/s/ Lynn Rivera</u> LYNN RIVERA	
19		Attorneys for Defendant NORDSTROM fsb	
20		NORDS INOIN 130	
21	DATED: December 13, 2015	KAZEROUNI LAW GROUP, APC	
22		<u>/s/ Michael Kind</u> DANNY HOREN	
23		Attorneys for Plaintiff JOVITA C. SALVADOR	
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25		IT IS SO ORDERED:	
26	DATED: December 14, 2015	Children of the control of the contr	
27		UNITED STATES DISTRICT JUDGE	
28	4824-2341-6108, v. 1		

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